

Matthew W. Lampe (*pro hac vice* application pending)  
mwlampe@jonesday.com  
Wendy C. Butler (WB-2539)  
wbutler@jonesday.com  
Craig S. Friedman (CF-1988)  
csfriedman@jonesday.com  
JONES DAY  
222 East 41<sup>st</sup> Street  
New York, New York 10017  
(212) 326-3939

Matthew W. Ray (*pro hac vice* application pending)  
mwwray@jonesday.com  
JONES DAY  
2727 North Harwood Street  
Dallas, Texas 75201  
(214) 220-3939

Attorneys for Defendant  
International Business Machines Corporation

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES SEWARD, Individually, and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION D/B/A IBM CORP.,

Defendant.

08 CIV 3976 (KMK)

ECF CASE

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

*Fee paid  
\$25  
E651188*

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JUN 10 2008  
CLERK OF COURT

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Craig S. Friedman, a member of good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of

Matthew W. Lampe  
Jones Day  
222 East 41<sup>st</sup> Street  
New York, New York 10017  
(212) 326-3939  
mwlampe@jonesday.com

Matthew W. Lampe is a member in good standing of the Bar of the State of Ohio. There are no pending disciplinary proceedings against Matthew W. Lampe in any State or Federal court.

Dated: June 5, 2008

JONES DAY

A handwritten signature in black ink, appearing to read 'Craig S. Friedman', is written over a horizontal line.

Craig S. Friedman (CF-1988)  
csfriedman@jonesday.com  
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New York, New York 10017  
(212) 326-3939  
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International Business Machines Corporation

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Defendant.

**08 CIV 3976 (KMK)**

**ECF CASE**

**DECLARATION OF  
CRAIG S. FRIEDMAN  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL PRO HAC VICE**

CRAIG S. FRIEDMAN declares as follows:

1. I am an associate at Jones Day, counsel to Defendant International Business Machines Corporation. I am familiar with the proceedings in this case. I submit this declaration based on my personal knowledge of the facts set forth herein and in support of Defendant's

motion to admit Matthew W. Lampe as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on February 15, 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Matthew W. Lampe is a partner with Jones Day. I have found Mr. Lampe to be a skilled attorney and a person of integrity. He was admitted to practice before the courts of the State of Ohio on November 6, 1989. He has been and is a member in good standing of the aforementioned bar. Mr. Lampe is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. His Certificate of Good Standing from the Clerk of the Supreme Court of Ohio is attached hereto as Exhibit A.

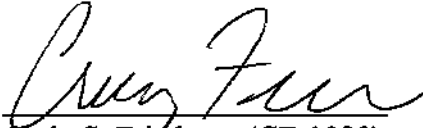
4. Accordingly, I am pleased to move the admission of Matthew W. Lampe, *pro hac vice*.

5. Attached as Exhibit B is a proposed order granting this motion.

WHEREFORE, it is respectfully requested that the motion to admit Matthew W. Lampe, *pro hac vice*, to represent Defendant in the above-caption matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 5th day of June, 2008.  
New York, New York

  
Craig S. Friedman (CF-1988)

# The Supreme Court of Ohio

## C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Matthew Willis Lampe

was admitted to the practice of law in Ohio on November 06, 1989; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 29th day of May, 2008.

SUSAN B. CHRISTOFF

*Director, Attorney Services Division*

  
D. Allan Glavin  
*Attorney Services Counsel*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES SEWARD, Individually, and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION D/B/A IBM CORP.,

Defendant.

**08 CIV 3976 (KMK)**

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion Craig S. Friedman, attorney for Defendant International Business  
Machines Corporation, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED THAT**

Matthew W. Lampe  
Jones Day  
222 East 41<sup>st</sup> Street  
New York, New York 10017  
(212) 326-3414  
mwlampe@jonesday.com

is admitted to practice *pro hac vice* as counsel for Defendant International Business Machines Corporation in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including Rules governing disciplining of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: June \_\_, 2008

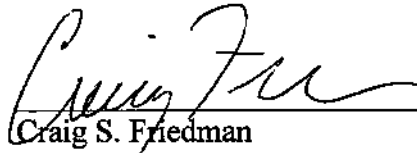
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United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE to be served on the following counsel of record this 5th day of June, 2008 by forwarding a copy, by First Class mail, addressed to:

Erik H. Langeland, Esq.  
Erik H. Langeland, P.C.  
500 Fifth Avenue, Suite 1610  
New York, New York 10110

  
Craig S. Friedman

